May 3, 2023

via EM/CF

USDC SDNY
DOCUMENT
ELECTRONICALLY FILED
DOC #: \_\_\_\_
DATE FILED: \_ 5/3/2023

Jones Law Firm P.C

The Honorable Barbara C. Moses Daniel Patrick Moynihan Courthouse 500 Pearl Street, Room 740 New York, NY 10007

## **MEMO ENDORSED**

Re: Request for Extension in SDNY Case No. 21-cv-01803, Coker v. Goldberg & Associates P.C.

Dear Magistrate Judge Moses:

I write today to respectfully request the Court for a two-week extension to respond and file opposition to Plaintiff's letter motion regarding discovery insufficiencies and a request for sanctions against Defendants (filed on April 28, 2023, ECF No. 78).

I am the attorney handling this case for Defendants, and I am currently preparing for a trial taking place next week for another of my cases. As such, I do not have an appropriate amount of time to review Plaintiff's letter motion and prepare a satisfactory opposition on behalf of my clients for the next week, at the least.

Thus, I am humbly requesting the court allow me an additional two weeks to properly respond and file opposition to Plaintiff's letter motion.

Thank you for your attention to this matter.

Defendant fails to state whether plaintiff consents to the proposed extension. *See* Moses Ind. Prac. § 2(a). If plaintiff objects, plaintiff shall so advise the Court no later than **May 4, 2023**. SO ORDERED.

Hon. Barbara Moses, U.S.M.J.

May 3, 2023

Respectfully,

T. Austin Brown, Esq.

Jones Law Firm, P.C.

1270 6th Avenue, 7th Floor
New York, NY 10020
(212) 258-0685

austin@joneslawnyc.com
Attorneys for Defendants